

Domestic Origin Verification (DOV) QUICK GUIDE

- This guide is based on the DOV Specific Requirements.
- The DOV procedures shall be organized in a method to provide easy access for your company's reference and auditing, i.e., a manual.
- All requirements shall be addressed. Exclusions shall be explained by the applicant as to why they do not apply to its program and are limited to requirements 3.2.a, 3.2.b, and 4.2. Exclusions could also apply to either Section 2.0.a or 2.0.b, not both.

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1.0 General
Who is responsible for ensuring that the DOV procedures needed for the applicant's DOV process are established, implemented, and maintained and is responsible for reporting to top management on the applicant's DOV program performance? Provide that name in your manual.
2.0 Requirements for Receiving or Purchasing Components or Products
<p>The applicant shall have a verifiable written procedure addressing receiving or purchasing domestic origin components or products from growers and/or suppliers.</p> <p><i>Note: A grower is an individual or entity that develops a fruit, nut or vegetable through a process of natural growth to maturity (i.e., plant, cultivate, grow, and harvest).</i></p> <p><i>Note: A supplier is someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, or contractor). For the purposes of this document, it does not include a grower.</i></p> <p>a. If components are received from growers, the written verifiable procedure shall:</p> <ol style="list-style-type: none"> 1. Describe the process used to communicate the domestic origin requirement, and select growers based on their ability to provide components or products of domestic origin (i.e., makes it a requirement of purchase, includes in its contracts, field checks, etc.). 2. Include a current list of growers along with evidence they are growers (domestic addresses, field locations, etc.). If there are non-domestic growers, they must be identified as such, and included in the procedure for section 4.2. <p>b. If components or products are received from suppliers, the written verifiable procedure shall:</p> <ol style="list-style-type: none"> 1. Describe the process used to communicate the domestic origin requirement, and select suppliers based on their ability to provide components or products of domestic origin (i.e., makes it a requirement of purchase, includes in its contracts, requires DOV participation, requires trace-backs for every USDA contract, etc.). 2. Include a current list of all suppliers who supply components or products similar to that used in USDA contracts regardless of whether or not intended for use in USDA contracts. The list of suppliers shall show the respective components or products for each supplier. If components or products from a supplier are used for domestic components in the applicant's DOV process, the list shall include whether that supplier also handles non-domestic components or products.
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3.0 Identification and Verification Method
3.1 Identification
What is your company's procedure to identify the end item? The verifiable written procedure for identifying the end item (code or positive lot identification) shall be included giving a detailed example of that identification along with its explanation. If multiple components or products are requested for DOV program approval, an explanation of each end item code or positive lot identification is needed for each component or product.

3.2 Verification Method
<p>What is your company's method for tracking the end item component or product to show that it came from domestic growers?</p> <p>Your company shall have a verifiable written procedure for the method used for documenting that the end item component or product is of domestic origin. Through documentation, your company shall be able to provide the history, location, or activity of the component or product, as applicable, from the end item back to its domestic origin (growers).</p> <p><i>Note: An acceptable method for documenting domestic origin is trace-back, a method beginning at the end of a process (code or positive lot identification) and working back through the process either to the beginning or to a designated point to verify that the end item came from growers of domestic origin. Methods of tracking or verifying domestic origin may vary depending on the facility. It may or may not include working back through every step of receipt, packing, processing, or warehousing.</i></p> <p>a. <u>If raw components are not received directly from growers but have gone through an intermediary facility or stage of receipt and have not changed form (processed)</u>, the applicant shall include in its verifiable written procedure how it ensures the components or products maintain their domestic origin integrity through the intermediary facilities or stages of receipt. These facilities or stages of receipt may include, but are not limited to receiving stations, produce packing facilities, and warehousing, as applicable. If it has changed form (processed), follow the requirements for (b) as follows.</p> <p>b. <u>If processed components or products are received from a supplier</u>, the applicant shall include in its verifiable written procedure how the supplier ensures that the components or products maintain domestic origin integrity prior to receipt by the applicant.</p> <p><i>Note: Current acceptable methods are:</i> <i>(1) the supplier is an "Approved DOV Program Participant" or</i> <i>(2) the supplier shall provide a trace-back to the applicant for every USDA contract where the components or products are used. The applicant shall have a <u>record</u> of reviewing these trace-backs for adequacy and the trace-backs shall be on file.</i></p>
4.0 Monitoring the Domestic Origin Verification Process
4.1 Verification Activity
<p>At least once a year, for each component or product in the DOV program, the applicant shall verify the method described in Section 3.2 and be able to show evidence of its verification through records. If a non-conformance is found by the applicant during its verification process, corrective action shall be taken and documented. The applicant's annual verification activity records shall be on file for review by the DOV Auditor.</p>

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4.2 Segregating and Preventing the Use of Components or Products Not Intended for Customers Requiring Domestic	
<p>The applicant shall have a verifiable written segregation procedure addressing the process for preventing the use of components or products that are non-domestic and those “not established” as domestic in its products destined for customers requiring only domestic, including USDA. This refers to those components or products that are similar to that delivered to the USDA.</p>	
<p>a. As applicable, the verifiable written procedure shall include the process or segregation procedure for preventing the use of non-domestic components or products that are not intended for USDA. The written procedure shall include:</p> <ol style="list-style-type: none"> 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those non-domestic that are not intended for USDA; 2. Release authority; and 3. As applicable, physical separation. 	
<p>b. As applicable, the verifiable written procedure shall also include the process for preventing the use of components or products that are “not established” as domestic and are not intended for USDA. Components or products “not established” as domestic are those from suppliers who are not “<i>Approved DOV Program Participants</i>” or when the applicant has no trace-back(s) on file from suppliers when required under this program (see 3.2.b). The verifiable written procedure shall include:</p> <ol style="list-style-type: none"> 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those “not established” as domestic; 2. Release authority; and 3. As applicable, physical separation. 	
4.3 Controlling Non-conforming Components or Products	
<p>The applicant shall have a verifiable written procedure to control non-conforming components or products.</p> <p><i>Note: Non-conforming components or products are a quantity of product that is purchased, received, processed, packed or shipped that is not controlled by the applicant's DOV procedures and does not fulfill the specified domestic origin requirement.</i></p> <p>The procedure shall include the following elements, as applicable, based on the applicant's operation:</p> <ol style="list-style-type: none"> 1. Identifying and segregating non-conforming components or products; 2. Determining its disposition; 3. Authorizing release, such as for a program other than the applicant's DOV process; 4. Maintaining records of all non-conforming components or products and any subsequent actions taken; 5. Determining the cause of the non-conformance and taking action so that it does not occur again; and 6. Immediately reporting to the USDA, AMS, FV, CPB if non-domestic product is shipped to the USDA. A notification shall also be sent to the USDA, AMS, FV, Processed Products Branch field office in the applicant's area. Field office locations may be found at www.ams.usda.gov/fv/ppb.html. 7. Immediately, notify the DOV Coordinator when a non-conformance is found and it results in a necessary change in its DOV procedures, a change in its domestic origin status, or a change in the components or products noted in the Application for Service. 	
5.0 Corrective Action	
<p>Corrective action <u>records</u> relating to non-conformances in the applicant's DOV process shall be maintained either when identified by the applicant or when found during a DOV program audit.</p>	